

Message

From: Lane, Jackie [Lane.Jackie@epa.gov]
Sent: 1/31/2018 6:23:49 PM
To: Yogi, David [Yogi.David@epa.gov]
CC: LEE, LILY [LEE.LILY@EPA.GOV]
Subject: FW: Agency Review of Public Materials in Advance/EPA Formal Comment on Radiological Update Fact Sheet January 2018
Attachments: Tetra Tech recommendations to Navy EPA 2016-12-14 final.doc; RAD_DataUpdate_FactSheet 3_Jan2018_InternalDistributionOnly.pdf

Below is the update draft email you requested yesterday. J

From: Lane, Jackie
Sent: Friday, January 26, 2018 11:35 AM
To: Yogi, David <Yogi.David@epa.gov>
Subject: Agency Review of Public Materials in Advance/EPA Formal Comment on Radiological Update Fact Sheet January 2018

Dear David: As requested by Lily, I have incorporated a sentence to the draft below regarding submitting EPA's comments on the fact sheet for the record. A copy of the fact sheet is attached for your review as well. Please review the email below in this light and do not send it out as yet. We will need to incorporate everyone input into one document and send it as an attachment. FYI, Jackie

To: Ostrowski, Kimberly A CIV NAVFAC HQ, BRAC PMO <kimberly.ostrowski@navy.mil>

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Dear Kim:

On January 24 and 27, 2018 respectively, EPA emailed the Navy comments on the draft final radiological update fact sheet #3 and the posters developed for the January 31, 2018 open house. I would like to bring to your attention that this was the first time the agencies were seeing the fact sheet at 10:05 am on the January 24, 2018. At the community engagement team meeting that same day, the agencies asked when the Navy required comments on the fact sheet. The agencies were told they had 5 minutes to send comments because the fact sheet had to go print at 2:00pm. EPA sent preliminary comments early and complete comments later that same day. These comments were not incorporated.

I want to remind the Navy of the attached EPA recommendation letter dated December 14, 2016 and an excerpt below requesting ample time to review material before release to the public. This is a concern that the Navy verbally agreed to adhere to on several occasions. This request is an important activity highlighted in the Radiological Communication Plan 2.6 and all its earlier versions.

The most consistent reason for this breach is all public material for the investigation must be reviewed by Navy upper management prior to release to the agencies. Due to this fact, it leaves little to no time for agencies to give constructive input. That being said, EPA assumes Navy attorneys have reviewed any documents prior to submission to Navy upper management, and this draft final is releasable to the agencies. I am requesting that any further draft material developed be shared with the agencies at this juncture.

“Recommendation #3: Develop routine site-update materials, maintain a web presence accessible for a lay audience, and provide “in-language” translations and interpretation services (for in-person meetings) as needed.

As part of this recommendation, it is requested the following process and planning steps also be implemented to: (1) keep regulatory agencies informed; and (2) aid in ensuring consistent messaging.

- Publication material slated for distribution is expected to be reviewed by participating agencies in advance of distribution. Enough review time should be given to participating agencies for the Navy to incorporate changes and recommendations made by participating agencies.
- Community presentations are expected to be reviewed and practiced with participating agencies in advance of delivery to the community. Enough review time should be given to participating agencies for the Navy to incorporate changes and recommendations made by participating agencies.”

“Accepting formal public comment on key documents (*e.g.*, milestone workplans) should also be factored into the Navy’s workflow.”

Please have a discussion with Navy upper management and begin implementing this request as soon as possible.

Sincerely

David